

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TIME'S UP, INC.

X

07 CIV 9557  
Inde

Plaintiffs,

COMPLAINT

-Against-

THE CITY OF NEW YORK,  
COMMISSIONER OF THE NEW  
YORK CITY POLICE DEPARTMENT  
RAY KELLY, OFFICER CAROLYN  
FANALE, OFFICER STEVEN BOBBETT,  
OFFICER LUIS MORTIMER (16934),  
DEPUTY INSPECTOR THOMAS GRAHAM  
and APPROXIMATELY 34 OTHER UNIDENTIFIED  
NEW YORK CITY POLICE OFFICERS,  
Defendants.

JURY TRIAL  
DEMANDED

X

PLAINTIFF TIME'S UP, INC., by their counsel, WYLIE STECKLOW, ESQ.

allege as follows for their Complaint against the above defendants:

1. This is an action to redress the deprivation by the defendants of rights

secured to the Plaintiff TIME'S UP, INC., ("TIME'S UP!"), by the Constitution of the  
United States and the State of New York.

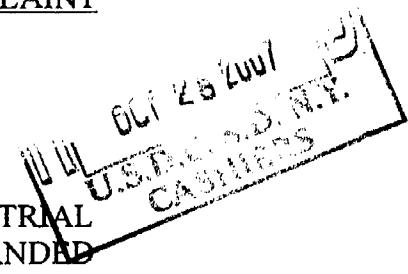
2. TIME'S UP! was subjected to unlawful invasion, entry, and search of its  
premises in the absence of probable cause or a warrant, unlawful assault upon, and  
harassment of, unlawful imprisonment and arrest of its members and associates, and  
deprivation of its rights to expressive speech, peaceably assemble, associate with its  
neighbors and engage in its lawful activities.

3. This is an action for damages sustained by citizens of the United States  
against police officers of the New York City Police Department, who unlawfully  
imprisoned, assaulted, and harassed individuals and unlawfully invaded, entered and

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LAW DEPARTMENT  
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COUNSEL

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COUNSEL



**Subject: Re: Time'S UP Inc. v. City, et al., 07-CV-9557**

**Date:** Thursday, October 25, 2007 5:24 PM

**From:** WylieLAW <wyylie@wylielaw.com>

**To:** "Larkin, Arthur" ALarkin@law.nyc.gov

**Cc:** Marlon\_Ovalles@nysd.uscourts.gov

**Conversation:** Time'S UP Inc. v. City, et al., 07-CV-9557

10-25-07

Arthur

Please find attached a pdf version of the Summons, Complaint, Letter requesting personal service on behalf of the individual officers.

Paragraphs 100, 101, 107, 113 were blacked out on the filed complaint, they have been formatted with 'double strike through' on the pdf version.

Earlier today the Summons and Complaint was served on the City and NYPD Commissioner (attached Complaint cover sheet contains service stamps).

Please let me know if you are amenable to accepting service on the individual officers, as per the instructions contained on the SDNY website.

Thank you,

Wylie

On 10/25/07 10:24 AM, "Marlon\_Ovalles@nysd.uscourts.gov" <Marlon\_Ovalles@nysd.uscourts.gov> wrote:

Wylie,

I've shared your e-mail below and your October 19, 2007 letter with Judge Crotty. I've been instructed by Judge Crotty not to answer any further questions on this matter.

Marlon Ovalles  
Courtroom Deputy to the Hon. Paul A. Crotty, U.S.D.J  
United States District Court  
Southern District of New York